

**UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

**IN RE:**

<b>SOUTHEASTERN PLATEWORKS, LLC,</b>	<b>)</b>	<b>CASE NO. 17-04113-DSC</b>
	<b>)</b>	<b>CHAPTER 11</b>
<b>DEBTOR.</b>	<b>)</b>	

**APPLICATION BY THE OFFICIAL UNSECURED CREDITORS COMMITTEE FOR  
APPROVAL OF EMPLOYMENT OF C. TAYLOR CROCKETT AS CONFLICTS  
COUNSEL, NUNC PRO TUNC, EFFECTIVE NOVEMBER 2, 2017**

Pursuant to 11 U.S.C. §§327, 328, 330, 503, 1103 and Bankruptcy Rule 2014(a),

\_\_\_\_\_ the Trustee of the captioned bankruptcy case

  X   the Official Unsecured Creditors Committee (the “Committee”) in Chapter 11 of the Bankruptcy Code, requests the Court to approve the employment of C. Taylor Crockett, 2067 Columbiana Road, Birmingham, AL 35216, as Conflicts Counsel relating to matters with Iberia Bank and Blue Cross Blue Shield to represent or assist the Committee in carrying out its duties.

In support of this request, Applicant represents as follows:

1. The person whose employment is requested (hereinafter “said person”)
  - (a) is professionally qualified and licensed, if required, for such employment;
  - (b) does not hold or represent an interest adverse to the estate;
  - (c) is a disinterested person as that term is defined in §101(13) of the Bankruptcy Code;
  - (d) has not served as an examiner in this case; and
  - (e) is not employed by and does not represent a creditor in this case.
2. The Committee requires the services of Conflicts Counsel who is qualified and experienced in Chapter 11 matters.

3. The professional services to be rendered are as follows:

To give legal advice and assist the Committee related to the acts, conduct, assets, liabilities, financial conditions of the Debtor, the operation of the Debtor's business, and any other matter relevant to this Case, and to perform such other legal services as may be required and in the interest of the unsecured creditors and as directed by the Committee as they relate to Iberia Bank and Blue Cross/Blue Shield.

4. The reasons for the selection of said person are:

Counsel has extensive experience in Chapter 11 proceedings.

5. All of said person's connections with the Debtor, creditors, other parties in interest, and with their respective attorneys and accountants, the Bankruptcy Administrator, or any person employed in the office of the Bankruptcy Administrator, are as follows:

None.

6. The representations made in this Application with respect to said person apply to each of that person's partners and associates and members of the firm, professional corporation or other entity with whom or with which said person is professionally associated.

7. Applicant proposes the following reasonable terms and conditions of said person's employment subject to the Court's approval under 11 U.S.C. §§ 330 and 331.

Allowance for expenses (if any):

Reimbursement of all actual and necessary expenses.

Hourly basis for said person and for each other person expected to perform work and to be included in any application for compensation:

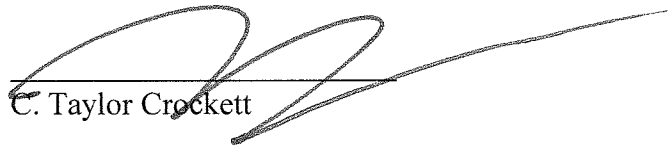
C. Taylor Crockett - \$375.00 per hour for all work and services performed.

Contingent fee basis (if applicable):

N/A

**WHEREFORE**, the Committee respectfully requests that: (a) its employment of C. Taylor Crockett to represent it in this Case under Chapter 11 of the Bankruptcy Code be approved *nunc pro tunc* to November 2, 2017, on the terms set forth in this Application and any orders of this Court with respect to payment procedures for professionals in this Case, and (b) provide such other and further relief as is just and proper.

Respectfully submitted this the 30<sup>th</sup> day of Nov, 2017.

  
C. Taylor Crockett

Conflicts Counsel for the Official  
Committee of Unsecured Creditors

OF COUNSEL:

C. Taylor Crockett, P.C.  
2067 Columbiana Road  
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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing document by Notice of Electronic Filing, or, if the party served does not participate in Notice of Electronic Filing, by U.S. First Class Mail or email on this the 30<sup>th</sup> day of November, 2017.

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